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Netflix, Inc., and Netflix Worldwide
Entertainment, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY,

Plaintiff,

v.

NETFLIX, INC., and NETFLIX
WORLDWIDE ENTERTAINMENT,
LLC,

Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**[PROPOSED] ORDER GRANTING
DEFENDANTS NETFLIX, INC. AND
NETFLIX WORLDWIDE
ENTERTAINMENT, LLC'S
REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF ANTI-SLAPP
MOTION TO STRIKE**

Date: September 3, 2024
Time: 9:00 a.m.
Place: Courtroom 850

Hon. R. Gary Klausner

[PROPOSED] ORDER

Based on defendants Netflix, Inc. and Netflix Worldwide Entertainment, LLC's Request for Judicial Notice in Support of Anti-SLAPP Motion to Strike the Complaint filed by plaintiff Fiona Harvey, and for good cause appearing for the entry thereof, IT IS HEREBY ORDERED that the Court will take judicial notice of:

1. **Exhibit A:** Harvey's interview on *Piers Morgan Uncensored* dated May 9, 2024;
2. **Exhibit B:** the article titled "Richard Gadd wins The Stage Edinburgh Award 2019" (*Oxford Drama*, August 24, 2019; <https://oxforddrama.ac.uk/news/richard-gadd-wins-the-stage-edinburgh-award-2019/>, last accessed July 23, 2024);
3. **Exhibit C:** the article titled "Richard Gadd on his stalker: 'It would be unfair to say she was awful and I'm a victim'" (Logan, Brian; *The Guardian*, September 10, 2019; <https://www.theguardian.com/stage/2019/sep/10/richard-gadd-stalker-baby-reindeer>, last accessed July 23, 2024);
4. **Exhibit D:** the article titled "Baby Reindeer review: Searingly personal work from Richard Gadd feels like a radical gesture" (Thompson, Jessie; *The Standard*, October 14, 2019; <https://www.standard.co.uk/culture/theatre/baby-reindeer-review-searingly-personal-work-from-richard-gadd-feels-like-a-radical-gesture-a4260691.html>, last accessed July 23, 2024);
5. **Exhibit E:** the article titled "Baby Reindeer (Bush Theatre)" (*Lou Reviews*, October 17, 2019; <https://loureviews.blog/2019/10/17baby-reindeer-bush-theatre/>, last accessed July 23, 2024);
6. **Exhibit F:** the article titled "Richard Gadd wins an Olivier Award" (*Chortle*, October 26, 2020;

- 1 https://www.chortle.co.uk/news/2020/10/26/47175/richard_gadd_win
2 [s_an_olivier_award](https://www.chortle.co.uk/news/2020/10/26/47175/richard_gadd_win), last accessed July 23, 2024);
- 3 7. **Exhibit G:** the article titled “Richard Gadd’s Baby Reindeer to be
4 adapted into Netflix Series” (Wood, Alex; *What’s On Stage*,
5 December 13, 2020; [https://www.whatsonstage.com/news/richard-](https://www.whatsonstage.com/news/richard-gadds-baby-reindeer-to-be-adapted-into-netflix-series_53015/)
6 [gadds-baby-reindeer-to-be-adapted-into-netflix-series_53015/](https://www.whatsonstage.com/news/richard-gadds-baby-reindeer-to-be-adapted-into-netflix-series_53015/), last
7 accessed July 23, 2024);
- 8 8. **Exhibit H:** the article titled “Netflix Trailer for ‘Baby Reindeer’
9 Awkward Stalker Dark Comedy Series” (Billington, Alex; *First*
10 *Showing*, March 22, 2024; [https://www.firstshowing.net/2024/netflix-](https://www.firstshowing.net/2024/netflix-trailer-for-baby-reindeer-awkward-stalker-dark-comedy-series/)
11 [trailer-for-baby-reindeer-awkward-stalker-dark-comedy-series/](https://www.firstshowing.net/2024/netflix-trailer-for-baby-reindeer-awkward-stalker-dark-comedy-series/); last
12 accessed July 28, 2024);
- 13 9. **Exhibit I:** the article titled “Netflix’s ‘Baby Reindeer’ review: One
14 of the most brilliant and upsetting shows of 2024” (Hayson, Sam;
15 *Mashable*, April 16, 2024; [https://mashable.com/article/netflix-baby-](https://mashable.com/article/netflix-baby-reindeer-review#:~:text=Baby%20Reindeer%20is%20often%20hard,is%20painful%2C%20for%20multiple%20reasons)
16 [reindeer-](https://mashable.com/article/netflix-baby-reindeer-review#:~:text=Baby%20Reindeer%20is%20often%20hard,is%20painful%2C%20for%20multiple%20reasons)
17 [review#:~:text=Baby%20Reindeer%20is%20often%20hard,is%20pai](https://mashable.com/article/netflix-baby-reindeer-review#:~:text=Baby%20Reindeer%20is%20often%20hard,is%20painful%2C%20for%20multiple%20reasons)
18 [nful%2C%20for%20multiple%20reasons](https://mashable.com/article/netflix-baby-reindeer-review#:~:text=Baby%20Reindeer%20is%20often%20hard,is%20painful%2C%20for%20multiple%20reasons), last accessed July 23,
19 2024);
- 20 10. **Exhibit J:** the article titled “Netflix’s ‘Baby Reindeer’ Is a Brilliant
21 and Jarring Account of Stalking, Victimization and Emotional
22 Turmoil: TV Review” (Tinubu, Aramide; *Variety*, April 18, 2024;
23 [https://variety.com/2024/tv/reviews/baby-reindeer-review-richard-](https://variety.com/2024/tv/reviews/baby-reindeer-review-richard-gadd-1235975310/)
24 [gadd-1235975310/](https://variety.com/2024/tv/reviews/baby-reindeer-review-richard-gadd-1235975310/), last accessed July 23, 2024);
- 25 11. **Exhibit K:** the article titled “Is Netflix’s ‘Baby Reindeer’ Set To
26 Stampede The Emmy Awards” (Lago, Giovanni; *Next Big Picture*,
27 May 9, 2024; [https://nextbestpicture.com/is-netflixs-baby-reindeer-](https://nextbestpicture.com/is-netflixs-baby-reindeer-set-to-stampede-the-emmy-awards/#google_vignette)
28 [set-to-stampede-the-emmy-awards/#google_vignette](https://nextbestpicture.com/is-netflixs-baby-reindeer-set-to-stampede-the-emmy-awards/#google_vignette), last accessed

- 1 July 23, 2024);
- 2 12. **Exhibit L:** the article titled “Baby Reindeer Begins a Journey to
- 3 Emmys Gold at Gotham TV Awards” (Walsh, Savannah; *Vanity Fair*,
- 4 June 5, 2024; [https://www.vanityfair.com/hollywood/story/baby-](https://www.vanityfair.com/hollywood/story/baby-reindeer-begins-a-journey-to-emmys-gold-at-gotham-tv-awards#:~:text=Baby%20Reindeer%20Begins%20a%20Journey,Smit)
- 5 [reindeer-begins-a-journey-to-emmys-gold-at-gotham-tv-](https://www.vanityfair.com/hollywood/story/baby-reindeer-begins-a-journey-to-emmys-gold-at-gotham-tv-awards#:~:text=Baby%20Reindeer%20Begins%20a%20Journey,Smit)
- 6 [awards#:~:text=Baby%20Reindeer%20Begins%20a%20Journey,Smit](https://www.vanityfair.com/hollywood/story/baby-reindeer-begins-a-journey-to-emmys-gold-at-gotham-tv-awards#:~:text=Baby%20Reindeer%20Begins%20a%20Journey,Smit)
- 7 [h%20and%20Colin%20From%20Accounts](https://www.vanityfair.com/hollywood/story/baby-reindeer-begins-a-journey-to-emmys-gold-at-gotham-tv-awards#:~:text=Baby%20Reindeer%20Begins%20a%20Journey,Smit), last accessed July 23,
- 8 2024);
- 9 13. **Exhibit M:** the article titled “MP wife’s stalker; lawyer Laura tells of
- 10 fired trainee’s hate campaign” (McPherson, Lynn; *Sunday Mail*,
- 11 January 30, 2000;
- 12 <https://www.thefreelibrary.com/MP+WIFE%27S+STALKER%3B+L>
- 13 [awyer+Laura+tells+of+fired+trainee%27s+hate...-a061570268](https://www.thefreelibrary.com/MP+WIFE%27S+STALKER%3B+L), last
- 14 accessed July 23, 2024);
- 15 14. **Exhibit N:** the article titled “I’VE GOT A LONG WRRAY TO GO
- 16 YET; MP Jimmy Wray talks for the first time about his stroke, his
- 17 family and the condition that blights his littleboy’s progress” (Brown,
- 18 Annie; *Daily Record*, March 3, 2004;
- 19 <https://www.thefreelibrary.com/I%27VE+GOT+A+LONG+WRRAY>
- 20 [+TO+GO+YET%3B+MP+Jimmy+talks+for+the+first+time...-](https://www.thefreelibrary.com/I%27VE+GOT+A+LONG+WRRAY)
- 21 [a0113836577](https://www.thefreelibrary.com/I%27VE+GOT+A+LONG+WRRAY), last accessed July 23, 2024);
- 22 15. **Exhibit O:** the article titled “‘Real-life’ Baby Reindeer stalking
- 23 Fiona Harvey was on police watchlist over ‘sinister’ campaign against
- 24 Sir Keir Starmer” (Sullivan, Mike; *The Sun*, May 20, 2024;
- 25 [https://www.thesun.co.uk/news/28035155/fiona-harvey-police-](https://www.thesun.co.uk/news/28035155/fiona-harvey-police-watchlist-keir-starmer-emails/)
- 26 [watchlist-keir-starmer-emails/](https://www.thesun.co.uk/news/28035155/fiona-harvey-police-watchlist-keir-starmer-emails/), last accessed July 23, 2024);
- 27 16. **Exhibit P:** the article titled “‘Baby Reindeer’ Creator Richard Gadd
- 28 Asks Fans to Stop Speculating on Show’s Real-Life Characters”

(Gardner, Chris; *The Hollywood Reporter*, April 23, 2024;
<https://www.hollywoodreporter.com/tv/tv-news/baby-reindeer-creator-netflix-real-life-chracters-donny-martha-identity-1235879776/>, last accessed July 28, 2024);

17. **Exhibit Q:** the article titled “Baby Reindeer fans float theory that Richard Gadd’s stalker ‘Martha Scott’ might have been a man in real life – as they point out all the clues in the hit Netflix series” (Taylor, Jessica; *MailOnline*, April 23, 2024;
<https://www.dailymail.co.uk/femail/article-13339871/Baby-Reindeer-fans-float-theory-Richard-Gadds-stalker-Martha-Scott-man-real-life-point-clues-hit-Netflix-series.html>, last accessed July 28, 2024);
18. **Exhibit R:** the article titled “Richard Gadd asks fans to stop hunting real-life ‘Baby Reindeer’ characters” (Vollmer, Bernelee; *Sunday Tribune*, May 16, 2024; https://www.iol.co.za/sunday-tribune/entertainment/richard-gadd-asks-fans-to-stop-hunting-real-life-baby-reindeer-characters-8448358f-553e-48fd-9297-17ae9f9a5294#google_vignette, last accessed July 23, 2024);
19. **Exhibit S:** the article titled “Baby Reindeer: Has Richard Gadd's real stalker been revealed?” (Phillipson, Daisy; *Dexerto*, May 1, 2024;
<https://www.dexerto.com/tv-movies/baby-reindeer-has-richard-gadd-real-stalker-revealed-2655346/>, last accessed July 23, 2024);
20. **Exhibit T:** the article titled “Labour inquiry follows selection meeting” (*The Herald*, September 5, 2000;
<https://www.heraldscotland.com/news/12163265.labour-inquiry-follows-selection-meeting/>, last accessed July 23, 2024).

The Court takes notice of the aforementioned exhibits on the grounds that their existence and contents are not subject to reasonable dispute. *See Whitaker v. Fortuna Enterprises, L.P.*, 2021 WL 4260606, at *2 n.2 (C.D. Cal. May 21, 2021);

1 *Threshold Enterprises LTD. V. Pressed Juicery, Inc.*, 445 F.Supp.3d 139, 146
2 (N.D. Cal. 2020); *In re Bofl Holding, Inc. Secs. Litig.*, 2018 WL 1410729, at *7 n.5
3 (S.D. Cal. Mar. 21, 2018); *In re Am. Apparel, Inc. v. Shareholder Litig.*, 855 F.
4 Supp. 2d 1043, 1060-62 (C.D. Cal. 2012).

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7 **IT IS SO ORDERED.**
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9 Dated: _____, 2024

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11 Hon. R. Gary Klausner
12 United States District Judge
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